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Attorneys for Plaintiff  
ALEXUS DEERING

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

ALEXUS DEERING, on behalf of herself and  
others similarly situated,  
  
Plaintiff,  
  
v.  
  
AARON'S, LLC, a Georgia limited liability  
company; THE AARON'S COMPANY, INC., a  
Georgia corporation; and DOES 1 through 100,  
inclusive,  
  
Defendants.

Case No. 2:21-CV-01797-JAM-AC

**JOINT STIPULATION TO SUBMIT  
PLAINTIFF'S INDIVIDUAL  
CLAIMS TO ARBITRATION AND  
DISMISS THIS ACTION; ORDER**

[28 U.S.C. §§ 1332(b)(2), 1446, 1453]

[San Joaquin County Superior Court  
Case No. STK-CV-UOE-2021-8005]

Date Action Filed: August 26, 2021

1 Plaintiff ALEXUS DEERING (“Plaintiff”) and Defendants AARON’S, LLC and THE  
2 AARON’S COMPANY, INC. (“Defendants”) (together, the “Parties”) by and through their respective  
3 counsel of record, herein stipulate as follows:

4 WHEREAS, on August 26, 2021, Plaintiff filed a Class Action Complaint for Damages and  
5 Restitution (“Complaint”) in the Superior Court of the State of California, County of San Joaquin  
6 entitled *Alexus Deering, on behalf of herself and all other persons similarly situated v. Aaron’s LLC, a*  
7 *Georgia limited liability company; The Aaron’s Company, Inc., a Georgia corporation; and DOES I*  
8 *through 100, inclusive*, Case Number STK-CV-UOE-2021-8005;

9 WHEREAS, on September 30, 2021, Defendants removed this case to the United States District  
10 Court for the Eastern District of California under the Class Action Fairness Act, codified at 28 U.S.C.  
11 section 1332(d)(2) (“CAFA”);

12 WHEREAS, on October 18, 2021, Defendants notified Plaintiff’s counsel that Plaintiff signed an  
13 arbitration agreement requiring that her claims be arbitrated on an individual basis with the American  
14 Arbitration Association (*see Exhibit A*);

15 WHEREAS, in light of the arbitration agreement, Plaintiff wishes to dismiss this action and  
16 pursue arbitration of her individual claims;

17 NOW, THEREFORE, the Parties STIPULATE AND REQUEST as follows:

18 1. Plaintiff’s individual claims, as alleged in the Complaint, shall be submitted to arbitration  
19 pursuant to the Parties’ arbitration agreement (*see Exhibit A*);

20 2. Plaintiff’s class allegations in the Complaint—and thus this action in its entirety—be  
21 dismissed without prejudice.

22 IT IS SO STIPULATED.  
23  
24  
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28

1 DATED: November 15, 2021

SEYFARTH SHAW LLP

2  
3 By: /s/ Michael A. Wahlander

Christian J. Rowley

Sophia S. Kwan

Michael A. Wahlander

Ian T. Long

4  
5  
6 Attorneys for Defendants

AARON'S, LLC and THE AARON'S

COMPANY, INC.

7  
8  
9 DATED: November 15, 2021

THE NOURMAND LAW FIRM, APC

10 By /s/ James A. De Sario

Michael Nourmand

James A. De Sario

11  
12 Attorneys for Plaintiff

ALEXUS DEERING

13  
14  
15 Signature Attestation: I hereby attest that I have on file all holographic signatures corresponding to any  
signatures indicated by a conformed signature (/S/) within this e-filed document.

16  
17 DATED: November 15, 2021

18 By: /s/ Michael A. Wahlander

**ORDER**

The Court, having received the Joint Stipulation To Submit Plaintiff's Individual Claims To Arbitration And Dismiss This Action ("Joint Stipulation"), and good cause appearing therein, orders as follows:

1. Plaintiff's individual claims, as alleged in the Complaint, shall be submitted to arbitration pursuant to the Parties' arbitration agreement (*see* Exhibit A to the Joint Stipulation);

2. Plaintiff's class allegations in the Complaint—and thus this action in its entirety—shall be, and the same hereby are, DISMISSED without prejudice. The Clerk shall enter judgment in favor of Defendants and close the case.

**IT IS SO ORDERED.**

DATED: November 15, 2021

/s/ John A. Mendez

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THE HONORABLE JOHN A. MENDEZ  
UNITED STATES DISTRICT COURT JUDGE